

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorneys for Debtor

In Re:

Sharon Muse,

Debtor

Case No.: 16-24969 ABA

Chapter: 13

Judge: ABA

Hearing Date: October 19, 2021

**NOTICE OF MOTION TO
CANCEL AND DISCHARGE MORTGAGE**

To: Isabel C. Balboa
Chapter 13 Trustee
Cherry Tree Corporate Center
535 Route 38 Suite 580
Cherry Hill, New Jersey 08003

PLEASE TAKE NOTICE, that on October 19, 2021, at 10:00 a.m. the undersigned attorney for the debtor, Sharon Muse shall make application to the United States Bankruptcy Court, Mitchell H. Cohen US Courthouse, 400 Coor Street, 4th Floor, Camden, New Jersey 08101, Courtroom 4B for and Order to Cancel and Discharge Mortgage.

WHEREFORE, the Debtor respectfully requests that this Honorable Court grant the Debtor's Motion in the above case.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than before 7 days prior to the hearing date, or no later than October 12, 2021.

You must also mail a copy of your response to:

Isabel C. Balboa
Chapter 13 Trustee
535 Route 38, Suite 580
Cherry Hill, New Jersey 08003

Andrew T. Archer, Esq.
BRENNER, SPILLER & ARCHER
175 Richey Avenue
Collingswood, NJ 08107

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the court's consideration of this motion, as it does not involve complex issues of law.

Date: September 29, 2021

/s/ Andrew T. Archer
Andrew T. Archer, Esq.